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** E-filed November 23, 2011 **

6 Attorneys for Defendant
7 PrO Unlimited, Inc.

8 IN THE UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

10 MICHAEL LAZARIN, STEPHEN KOHLER,
11 and PAUL CAPANO, individually and on
12 behalf of other members of the general public
13 similarly situated, and as aggrieved employees
pursuant to the Private Attorneys General Act
("PAGA")

Case No. 5:11-CV-03609-HRL

**JOINT STIPULATION TO EXTEND TIME
FOR RULE 26(f) REPORT, INITIAL
DISCLOSURES AND CMC CONFERENCE
AND ~~PROPOSED~~ ORDER**

14 Plaintiffs,

15 v.

16 PRO UNLIMITED, INC., JUNIPER
17 NETWORKS, INC., JUNIPER
18 NETWORKS HOLDINGS
INTERNATIONAL, INC., and JUNIPER
NETWORKS (US), INC.

19 Defendants.

20
21 TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL:

22 WHEREFORE, pursuant to Federal Rule of Civil Procedure 16(b)(4), and for good cause,
23 plaintiffs Michael Lazarin, Stephen Kohler and Paul Capano ("Plaintiffs"), and defendants PrO
24 Unlimited, Inc. ("PrO"), Juniper Networks, Inc., Juniper Network Holdings International, Inc.,
25 and Juniper Networks (US), Inc., by and through their respective attorneys of record, hereby
26 jointly stipulate and request the Court to vacate the dates set forth in the Order granting the Joint
27 Stipulation to Extend Time for Filing Rule 26(f) Report, Initial Disclosures, and CMC
28 Conference, filed on September 28, 2011, and in the Clerk's Notice of Continuing Case

1 Management Conference filed on November 14, 2011, and to continue such dates as set forth in
 2 the stipulation below. Plaintiffs and Defendants currently are exploring the prospects for possible
 3 early settlement and/or mediation. Last week Defendant PrO voluntarily produced data and
 4 documents to facilitate potential settlement and/or mediation. Defendant Juniper Network, Inc.
 5 ("Juniper") made its first appearance on November 7, 2011; on November 22, 2011, the parties
 6 filed a stipulation and order to dismiss the named Defendants Juniper Networks Holdings
 7 International, Inc. and Juniper Networks (US). The parties respectfully request additional time to
 8 focus on streamlining the litigation.

9 WHEREFORE, the parties hereby jointly stipulate and request as follows:

- 10 1. The current deadline of November 22, 2011, to file the Rule 26(f) Report, to
 11 complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
 12 a Case Management Statement per the Court's Notice Continuing Case
 13 Management Conference filed on November 14, 2011, be continued to January 17,
 14 2012;
- 15 2. The current deadline of November 22, 2011, to file a joint case management
 16 statement, be continued to January 17, 2012; and
- 17 3. The Initial Case Management Conference presently set for November 29, 2011, be
 18 continued to January 24, 2012.

19 IT IS SO STIPULATED.

20 Date: November 22, 2011 RUKIN HYLAND DORIA & TINDALL LLP

21 By: /s/
 22 Peter Rukin
 Attorneys for Plaintiffs

23 Date: November 22, 2011 JACKSON LEWIS LLP

24 By: /s/
 25 Cary G. Palmer
 Attorneys for Defendant
 PrO Unlimited, Inc.

1 Date: November 22, 2011

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

2 By: /s/

3 Baldwin J. Lee
4 Attorneys for Defendant
5 Juniper Networks, Inc., Juniper Network
Holdings, International, Inc. and Juniper
Networks (US), Inc.

6

7 FOR GOOD CAUSE, IT IS HEREBY ORDERED AS FOLLOWS:

- 8
- 9 1. The current deadline of November 22, 2011, to file the Rule 26(f) Report, to
complete initial disclosures, to state objections in the Rule 26(f) Report, and to file
a Case Management Statement be continued to January 17, 2012;
- 10
- 11 2. The current deadline of November 22, 2011, to file a joint case management
statement, be continued to January 17, 2012; and
- 12
- 13 3. The Initial Case Management Conference presently set for November 29, 2011, be
continued to January 24, 2012.
- 14

15 Dated: November 23, 2011



HONORABLE HOWARD R. LLOYD
MAGISTRATE JUDGE OF THE
UNITED STATES DISTRICT COURT

20 4822-2385-5886, v. 1